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Co-Counsel to the Reorganized Debtors

Counsel to Intellectual Ventures II LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|-----------------------------|---|------------------------|
| In re: |) | Chapter 11 |
| |) | |
| FRONTIER COMMUNICATIONS |) | Case No. 20-22476-MG |
| CORPORATION <i>et al.</i> , |) | |
| |) | Judge Martin Glenn |
| Reorganized Debtors. |) | (Jointly Administered) |
| |) | |

JOINT STATUS REPORT CONCERNING INTELLECTUAL VENTURES CLAIM

1. The above-captioned reorganized debtors (the “Reorganized Debtors” or “Frontier”) and claimant Intellectual Ventures II, LLC (“IV”) provide the following status report, as directed by the Court during the May 18, 2022 status conference.

2. During the foregoing status conference, the Court instructed the parties to confer regarding: (1) the case schedule (proposed to occupy two days in a proposed three-day window of Oct. 18-20, 2022), and (2) mediation. In view of the Court’s guidance at the May 18 status conference, the parties hereby inform the Court as to the status of these issues.

SCHEDULE

3. The parties have confirmed that all witnesses will be available for live trial and cross-examination during the proposed window and request that trial be scheduled for October 18 and 19, 2022. This then would correspond to the following pre-trial due dates:

- 28 days prior to trial (September 20th): Parties exchange exhibit lists and proposed stipulated facts. Parties to subsequently meet-and-confer prior to submission of direct testimony with regard to agreed-to exhibits (and labelling) and any stipulated facts.
- 21 days prior to trial (September 27th): Parties to: (1) file written direct testimony for all witnesses, (2) file stipulated facts with the court, (3) exchange pre-marked exhibits, and (4) file any motions *in limine*.
- 14 days prior to trial (October 4th): Parties to file Joint Pretrial Conference Order and oppositions to any motions *in limine*.
- 30 days after trial (November 18th): Parties to file post-trial briefs including proposed finding of facts and law.

MEDIATION

4. IV has proposed the Hon. Sue L. Robinson (ret.) of Farnan LLP as a mediator. Frontier does not believe that the cost and time associated with mediation would be productive in this case and reserves all positions with respect to potential mediators in the event the Court orders mediation.

Dated: June 1, 2022

Respectfully submitted,

/s/ Timothy R. Shannon

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Counsel to Intellectual Ventures II LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2022, I caused a true and accurate copy of the foregoing document to be served on the counsel for all parties registered in ECF by filing the foregoing via the Court's ECF system.

/s/ David A. Herman
David A. Herman